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October 11, 2022

VIA EMAIL

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: Permission to Appear and File Restitution Claim in *United States v. Glencore International A.G.*, 22 Cr. 297 (LGS)

Dear Judge Schofield:

We represent Ian and Laurethé Hagen who are the 90% owners of Crusader Health RDC SARL (formerly, Crusader Health RDC SPRL), the “medical services company” referenced in paragraph 71 of the Statement of Facts appended to the plea agreement of Glencore International A.G. (“Glencore”) in the above-captioned case. (Plea Agreement, App. A ¶ 71).

As set forth in paragraphs 71-75 of the Statement of Facts, the Hagens were the victims of Glencore’s bribery scheme and are entitled to restitution under the Mandatory Victims Restitution Act, 18 U.S.C. § 3663A, and the Crime Victims’ Rights Act, 18 U.S.C. § 3771.

We respectfully request the opportunity to file a submission outlining the bases for the restitution claim and to be heard at sentencing.

We have contacted the attorneys for the government and Glencore and informed them of the Hagens’ intention to file a restitution claim with the Court. The government advised us that we should appear in this case as Interested Parties and make our submissions directly to the Court via ECF. We have also been advised by the docketing clerks that we must seek the Court’s permission to add our clients to the docket as Interested Parties before we can file our notices of appearance in this case.

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Accordingly, we respectfully ask the Court to add Ian and Laurethé Hagen to the docket as Interested Parties. Assuming the Court grants this request, we will file our notices of appearance and this letter on the public docket via ECF.

Respectfully submitted,

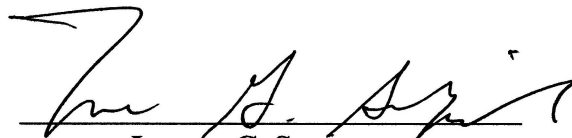
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cc: *United States Attorney's Office, Southern District of New York*
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Kimberly Parker, Esq. (by email)

Interested Parties Ian and Laurethé Hagen's application to file notices of appearance is GRANTED. Any restitution application shall be filed by **October 25, 2022**. The Government and Defendant's opposition, if any, shall be filed by **November 8, 2022**. Any reply shall be filed by **November 15, 2022**.

Dated: October 11, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE